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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RICHARD GIBSON, and HERIBERTO
VALIENTE,

Plaintiffs,

v.

MGM RESORTS INTERNATIONAL,
CENDYN GROUP, LLC, THE RAINMAKER
GROUP UNLIMITED, INC., CAESARS
ENTERTAINMENT INC., TREASURE
ISLAND, LLC, WYNN RESORTS HOLDINGS,
LLC,

Defendants.

Case No. 2:23-cv-00140-MMD-DJA

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINE TO
FILE THE PROPOSED DISCOVERY
PLAN

(FIRST REQUEST)

STIPULATION

Plaintiffs Richard Gibson and Heriberto Valiente (“Plaintiffs”) and Defendants Cendyn Group, LLC (“Cendyn”), the Rainmaker Group Unlimited, Inc. (“Rainmaker”), Caesars Entertainment, Inc. (“Caesars”), Treasure Island, LLC (“Treasure Island”), Wynn Resorts Holdings, LLC (“Wynn”), and MGM Resorts International (“MGM”) (together, “Defendants”) (collectively, Plaintiffs and Defendants are referred to herein as the “Parties”), by and through their respective counsel, for good cause shown, hereby stipulate and agree to extend LR 26-1’s deadline for the Parties to file their proposed discovery plan and scheduling order for the following reasons:

1. Defendants filed their Joint Motion to Dismiss the Complaint on March 27, 2023. (ECF No. 91). The same day, Defendant MGM filed a separate Motion to Dismiss. (ECF No. 92.)
2. Thereafter, on April 24, 2023, the Parties met and conferred in accordance with Federal Rule of Civil Procedure 26(f) and LR 26-1.
3. Pursuant to LR 26-1, the Parties’ discovery plan and scheduling order is currently due on May 8, 2023.
4. This Stipulation and amended briefing schedule has been entered into because Defendants have determined that they need additional time to continue the meet and confer process and prepare a discovery plan and scheduling order in accordance with the Local Rules, and Plaintiffs, as a professional courtesy and given the complex nature of the case, do not oppose this extension.

Accordingly, the Parties now hereby stipulate and agree, and respectfully request that the Court order, as follows:

1. The deadline for the Parties to file a Rule 26(f) proposed discovery plan and scheduling order is extended to and including Monday, May 15, 2023.

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2. This stipulation is filed in good faith and not intended to cause delay, but rather, to provide the Parties with sufficient time to work through various discovery plan issues in this multi-party class action.
3. Nothing in this stipulation is intended in any way to waive or affect the rights, claims, defenses, objections, or arguments that any party may have with respect to any matter, other than those expressly addressed and agreed herein.

ORDER

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 5th, 2023

1 Dated: May 4, 2023

Respectfully submitted,

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/s/ Steve W. Berman

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